Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 14 of 22
Reply to final Office Action mailed April 18, 2007

REMARKS

Status Summary

Claims 1-48 are pending in the present application, of which claims 1, 16, 31, 46, 47, and 48 are presented in independent form.   Claims 1-48 stand finally rejected. Claims 1-3, 5, 7, 10, 11, 14-18, 20, 22, 25, 26, 29-35, 37, 42, and 44-48 are amended.

Amendments to the Claims

Applicant's attorney appreciates the Examiner's interview on June 26, 2007, during which independent claims 1, 16, 31, 46, 47, and 48 and the patent issued to Edlund et al. were discussed. Based on that discussion, Applicant has amended claims 1, 16, 31, 46, 47 and 48 to clarify the scope of the term "resource" in the pending claims. In particular, claims 1, 16, 31, 46, 47 and 48, as amended, now recite that a "resource is a distinct, categorizable object associated with a resource type and stored in a data store." Support for this amendment is found throughout the specification, for example, at pages 8-9, paragraphs [026]-[027].   Accordingly, no new matter is presented.

Claims 3, 18, and 34 were amended to correct a minor typographical error and to conform to the amendments made to claims 1, 16, and 31.

Several of the claims have also been amended to remove recitations to certain triggering and causal actions that may, in some instances, be performed by or for "a user." While certain embodiments described in the application contemplate actions by users that, in turn, can cause components in the various arrangements described by Applicant to operate in a particular manner for the benefit of users, these triggering and causal actions are not central to Applicant's invention, as defined by the claims. As such, the triggering and causal actions were not contemplated to (and should not) limit the scopes of the claims. Because the amendments entered to remove these actions do not narrow the scopes of the claims, those seeking to interpret the claims should not

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 15 of 22
Reply to final Office Action mailed April 18, 2007

limit them to their literal scopes. It should be noted that the removal of references to "a user" in the pending claims does not inappropriately add new matter to the application.

Claim Rejection(s) - 35 U.S.C. § 102

Claims 1-48 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,484,162 to Edlund et al. ("Edlund"). Applicant respectfully traverses this rejection.

In accordance with the MPEP, anticipation under 35 U.S.C. § 102, requires that the reference teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. The anticipation rejection presented in the Office Action cannot stand at least because the cited reference fails to teach every aspect of the claimed invention, explicitly or impliedly.

The claimed present inventions are directed to systems, methods and a computer readable medium containing program instructions for providing links to one or more resources related to a specified resource. In claim 1, a method is recited that includes allowing for specifying a resource for which a relation is to be configured. The resource, as noted in the specification at paragraphs 026 and 027, is a distinct, categorizable object associated with a resource type and stored in a data store. The method also includes allowing for configuring the relation comprising a matching criteria for the specified resource. The relation is then associated with the specified resource and processed to create a relation set. The relation set comprises the links to the related resources that satisfy the matching criteria. Claim 16 is directed to a computer readable medium containing program instructions for implementing the method of claim 1, and claim 31 is directed to a system that includes a resource management system and a search engine configured to execute the method or program instructions recited in claims 1 and 16, respectively.

In claim 46, a method is recited that includes allowing for specifying a resource and to define a set of relationships associated with the specified resource. The set of

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 16 of 22
Reply to final Office Action mailed April 18, 2007

relationships is then utilized to determine the links associated with the related resources. The links are displayed for allowing navigation from the specified resource to the related resources by following the associated links. Claim 47 is directed to a computer readable medium that contains program instructions for implementing the method recited in claim 46, and claim 48 is directed to a system that is configured to execute the method in claim 46.

According to aspects of one embodiment, a resource is specified and one or more relationships configured to associate with that resource. Each configured relationship includes one or more constraints, which collectively form the matching criteria. When the matching criteria is executed by a search engine, links to the resources that satisfy the matching criteria are created and displayed. The links can be used to navigate to the related resources. Advantageously, a user of Applicant's invention, as defined by the claims, is allowed to control the type of resource sought, (i.e., whether the resource to be returned is an image or an album), who has access to the links, and the dynamic nature of the links, (i.e., when or how often the matching criteria is executed).

For example, a user of a photo-sharing website is allowed to automatically discover and manually specify relationships among resources, e.g., images and albums, which enables the site to provide links to related resources. The links depend on the type of relationship that the user wishes to make available for others or on the type of relationship that the user is interested in. Unlike conventional applications, the user has more flexibility in defining the type of relationship between the specified resource and the related resources. The user is not limited to static categories defined by the system, but rather is free to create constraints from parameters associated with the types of resources sought.

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 17 of 22
Reply to final Office Action mailed April 18, 2007

Independent Claims 1, 16, 31, 46, 47 and 48 are Allowable.

Applicant respectfully submits that Edlund fails to teach or suggest all of the claim limitations recited in claims 1, 16, 31, 46, 47 and 48 of the present invention. Edlund is directed to searching for resources stored in a database, i.e., data mining. In particular, Edlund focuses on reusing search queries and sharing database search strategies among users in order to retrieve documents from a document database. In Edlund, user created search queries are stored so that they can be searched, retrieved and reused in the future by the user who created the query or by another user. Each search query is associated with a label and description for more convenient searching and retrieval. If the author of the query does not provide a label and description for the query, the system can generate the label and description automatically based on the content of the query. Moreover, a query is associated with its creator and also with anyone who has used the query. So, a user can retrieve search queries created by another user as well as the search queries executed by another user (search history). See column 3, lines 20-67; column 4, lines 1-3.

Applicant respectfully submits that Edlund fails to teach or suggest specifying a resource that "is a distinct, categorizable object associated with a resource type and stored in a data store" and "associating the relation with the specified resource," as claim 1 requires. In contrast to Edlund, which is directed to data mining, the claimed invention has application related to web crawling, i.e., creating links from a specified resource to one or more other resources. According to aspects of one embodiment, a resource is specified and one or more relationships configured to associate with that resource. Each configured relationship includes one or more constraints, which collectively form a matching criteria. When the matching criteria is executed by a search engine, links to the resources that satisfy the matching criteria are created and displayed. Again, the links can be used to navigate to the related resources. Nothing in Edlund discloses specifying a resource, i.e., a distinct, categorizable object associated with a resource type and stored in a data store, for which the relation, i.e., query, is to

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 18 of 22
Reply to final Office Action mailed April 18, 2007

be configured and associating the relation/query with the specified resource, as recited in claim 1.

In the final Office Action, the Examiner rejected claim 1 by citing to a portion of Edlund that describes a Label Manager and the process of automatically generating a label and description for a search query (e.g., column 8, line 52 – column 10, line 22) and to a portion of Edlund that describes the process of retrieving the search history of another user based on a userID, and searching for label/description pairs that are related to a given search query (column 10, line 25 – column 11, line 5). Applicant respectfully submits that the cited portions fail to teach or suggest (at least in the context of resource as now defined in the pending claims) "allowing for specifying a resource," "allowing for configuring the relation comprising a matching criteria for the specified resource," and then "associating the relation with the specified resource,"

For example, the Examiner contends that "the user selects a specified resource such as information categories, news group articles, domains, etc.," citing column 9, line 66 – column 10, line 8. In the cited portion, Edlund discloses that the search query can include a mixture of words and phrases with predetermined attributes, such as DOMAIN or CATEGORY. Thus, the "specified resource" is apparently a word or phrase in the search query. As such, Applicant submits that Edlund fails to teach or suggest allowing for configuring a relation that comprises a matching criteria <u>for the specified resource</u>, and then associating that relation with the specified resource.

Similarly, with regard to the configured relation that is associated with the specified resource, the Examiner cites to the portion of Edlund that describes the Label Manager and how it generates a query label and query description for the search query (column 9, lines 1-49 and column 9, line 66 – column 10, line 8) and to the portion of Edlund that describes retrieving the search history for a particular user (column 10, line 25 – column 11, line 5). Nothing in the cited sections, however, describe a single element having all of the claimed features of the relation -- that is, comprising a

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 19 of 22
Reply to final Office Action mailed April 18, 2007

matching criteria for the specified resource and subsequently being associated with the specified resource.

In addition, claim 1 recites "processing the relation to create a relation set comprising <u>the links to</u> the one of more related resources satisfying the matching criteria." In Edlund, the user submits a search query that includes a query string, a query label and a query description. The system uses the query string to retrieve database documents, while the query label and query description are used to retrieve similar queries. The system presents the retrieve documents and the retrieved queries to the user. Nothing in Edlund teaches creating a relation set that comprises "the links to the one or more related resources satisfying the matching criteria" of the relation.

In the final Office Action, the Examiner indicates that Edlund teaches this feature at column 9, line 66 – column 10, line 22. That section, however, describes how the Label Manager processes the search query to generate the query label and the query description. Nothing describes creating a relation set that comprises <u>links</u> to one or more related resources satisfying the matching criteria of the relation.

During the telephone interview, the Examiner indicated that Edlund's database could be interpreted to be the specified resource and that the submitted query can be the relation that includes a matching criteria and that is associated with the database. Applicant respectfully submits, however, that a database is a collection of records or data stored on a computer, and not a resource that is "a distinct, categorizable object associated with a resource type and stored in a data store," as recited in claim 1. Indeed, a resource, as recited in claim 1, is typically stored <u>in a database</u> so that it can be updated or retrieved (see, e.g., Specification at paragraph [026]). Thus, Edlund's database cannot be said to teach or suggest the specified resource, as recited in claim 1.

Applicant respectfully submits that nothing in the cited portions teach or suggest "specifying a resource" for which a relation is to be configured, where the resource is "a distinct, categorizable object associated with a resource type and stored in a data

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 20 of 22
Reply to final Office Action mailed April 18, 2007

store," and "associating the relation with the specified resource," as recited in claim 1. Accordingly, claim 1 and its dependent claims are allowable over Edlund for at least the above reasons. Moreover, independent claims 16, 31, 46, 47 and 48 recite features that are substantially similar to the absent features discussed in conjunction with claim 1, and thus these claims and their respective independent claims are considered allowable for these same reasons.

Dependent Claims 2, 17 and 32 are Allowable.

Applicant respectfully submits that the cited reference fails to teach or suggest the claimed limitation in claims 2, 17 and 32. Claim 2 recites:

2. The method of claim 1, wherein allowing for configuring the relation includes:

allowing for selecting a resource type to be returned;

in response to the selection, retrieving automatically a template corresponding to the resource type, wherein the template comprises a plurality of parameters associated with the corresponding resource type; and

allowing for creating the matching criteria utilizing the plurality of parameters, wherein the one or more related resources satisfy the matching criteria.

Claim 17 is a computer readable medium containing program instructions implementing the method of claim 2 and claim 32 is directed to a system for executing the method of claim 2. In this aspect of the claimed invention, the system assists in configuring the relation by retrieving a template that corresponds to a desired resource type. The template includes parameters associated with the resource type that can be used to create the matching criteria of the relation.

Nothing in Edlund describes how their arrangement creates the query. Rather, the user in Edlund configures the query without assistance from their system. Nonetheless, the Examiner contents that Edlund discloses these features at column 8, line 52 to column 9, line 65, and states that Edlund allows a user to "retrieve prior

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 21 of 22
Reply to final Office Action mailed April 18, 2007

search queries that assist the user in retrieving resources the user wants returned."
(FOA at page 9, paragraph 20). In addition, the Examiner asserts that Edlund teaches
"a domain mapping table comprising a hash table that contains domain specific query
command[s] to aid the user in configuring the relation to the resource type the user
wants returned (see column 9, lines 16-34).

As discussed above with respect to claims 1, 16, 31, 46, 47 and 48, the cited
portion of Edlund describes the Label Manager component that automatically generates
a label and description for the query based on the query's words and phrases. In this
section of Edlund, the user has already composed his query and submitted it to the
database. Nothing in the cited portion teaches or suggests configuring a relation by
"allowing for selecting a resource type to be returned," retrieving a "template
corresponding to the resource type" that includes "a plurality of parameters," and
creating the "matching criteria utilizing the plurality of parameters," as required by claim
2. Also, Edlund's prior search queries are not "templates corresponding to a resource
type" and do not comprise "a plurality of parameters associated with the corresponding
resource type" that are utilized "to create the matching criteria." Finally, the mapping
table mentioned in Edlund is used by the Label Manager to generate the label and
description for the query based on the query's words and phrases. In particular, the
table is used to translate indexing keys specified for a particular query language to a
more human-understandable descriptor that can be used as a query label and
description pair. See, column 9, lines 16-34.

Accordingly, Applicant respectfully submits that claims 2, 17 and 32 are allowable
over Edlund for these reasons as well.

CONCLUSION

In view of the above, entry and favorable consideration of the above
amendments and remarks is respectfully requested. The Examiner is respectfully
requested to telephone the undersigned patent attorney at the below-listed number if,

Application No. 10/788,613   Attorney Docket No. I223/US
Paper filed July 18, 2007   Page 22 of 22
Reply to final Office Action mailed April 18, 2007

after reviewing the above Remarks, the Examiner believes outstanding matters remain that may be resolved without the issuance of a subsequent Official Action.

<div align="center">DEPOSIT ACCOUNT</div>

The Commissioner is hereby authorized to charge any additional fees, or credit any overpayment, associated with the filing of this paper to Deposit Account No. 50-3512.

Respectfully submitted,

Date: July 18, 2007   By: /Stephen J. Tytran; Reg. No. 45,846/

                                      Stephen J. Tytran
                                      Registration No. 45,846

Customer No: 49278
111 Corning Road; Ste. 220
Cary, North Carolina 27518
919 233 1942 x202(voice)
919 233 9907 (fax)